

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MICHAEL FEDER, Individually and On Behalf of :
All Others Similarly Situated, : Case No. 04-CV-8141
 :
 : Judge Laura T. Swain
Plaintiff, :
 :
 :
- v. - :
 :
 :
AMERICAN INTERNATIONAL GROUP, INC., :
MAURICE GREENBERG, HOWARD SMITH and :
THOMAS TIZZIO, :
 :
Defendants.

-----X
(Additional captions on following pages)

**DECLARATION OF SHELLEY THOMPSON IN SUPPORT OF MOTION OF THE
OHIO STATE FUNDS FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF PROPOSED LEAD
PLAINTIFF’S SELECTION OF LEAD COUNSEL**

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JEROME NOLL, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

- v. -

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH and
THOMAS TIZZIO,

Defendants.

-----X
STEPHEN FRANK, On Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

- v. -

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH and
THOMAS TIZZIO,

Defendants.

-----X
JOSEPH SCUILLA, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

- v. -

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH,
MICHAEL CASTELLI and MARTIN SULLIVAN,

Defendants.
-----X

:
: Civil Action No.: 04-CV-8226 (LTS)

:
: Judge Laura Taylor Swain

:
: Civil Action No.: 04-CV-8292 (LTS)

:
: Judge Laura Taylor Swain

:
: Civil Action No.: 04-CV-8336 (LTS)

:
: Judge Laura Taylor Swain

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EUGENE OLSEN,	:
	:
	: Civil Action No.: 04-CV-8339 (LTS)
	:
Plaintiff,	:
	: Judge Laura Taylor Swain
	:
- v. -	:
	:
AMERICAN INTERNATIONAL GROUP, INC.,	:
MAURICE GREENBERG, HOWARD SMITH,	:
and THOMAS TIZZIO,	:
	:
Defendants.	:
-----X	
ROBERT J. CASEY II, On Behalf of Himself and	:
All Others Similarly Situated,	:
	: Civil Action No.: 04-CV-8366 (LTS)
	:
Plaintiff,	:
	: Judge Laura Taylor Swain
	:
- v. -	:
	:
AMERICAN INTERNATIONAL GROUP, INC.,	:
HOWARD SMITH and THOMAS TIZZIO,	:
	:
Defendants.	:
-----X	
LISA M. CROUCH, On Behalf of Herself and All	:
Others Similarly Situated,	:
	: Civil Action No.: 04-CV-8579 (LTS)
	:
Plaintiff,	:
	: Judge Laura Taylor Swain
	:
- v. -	:
	:
AMERICAN INTERNATIONAL GROUP, INC.,	:
MAURICE GREENBERG, HOWARD SMITH and	:
THOMAS TIZZIO,	:
	:
Defendants.	:
-----X	

-----X
MICHAEL CASSIDY, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

- v. -

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH and
THOMAS TIZZIO,

Defendants.

-----X
ANNE E. FLYNN, On Behalf of Herself and All
Others Similarly Situated,

Plaintiff,

- v. -

AMERICAN INTERNATIONAL GROUP, INC.,
HOWARD SMITH and THOMAS TIZZIO,

Defendants.

-----X
ROBERT D. JAFFEE IRA ROLLOVER, ROBERT
D. & PHYLLIS A. JAFFEE FAMILY
FOUNDATION, and ROBERT D. JAFFEE, AS
TRUSTEE OF THE ROBERT D. JAFFEE
REVOCABLE TRUST,

Plaintiffs,

- v. -

AMERICAN INTERNATIONAL GROUP, INC.,
MAURICE GREENBERG, HOWARD SMITH and
THOMAS TIZZIO,

Defendants.
-----X

Civil Action No.: 04-CV-8642 (LTS)

Judge Laura Taylor Swain

Civil Action No.: 04-CV-9301 (UA)

Judge Unassigned

Civil Action No.: 04-CV-9615 (UA)

Judge Unassigned

SHELLEY THOMPSON hereby declares as follows:

1. I am an attorney with the law firm of Goodkind Labaton Rudoff & Sucharow LLP, counsel for the Ohio Public Employees Retirement System, the State Teachers Retirement System Of Ohio, and the Ohio Police and Fire Pension Fund (referred to collectively as "Movant" or the "Ohio State Funds").

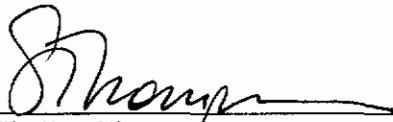
2. I respectfully submit this declaration in support of the Ohio State Funds' motion for consolidation of the related actions, appointment of Movant as Lead Plaintiff and approval of the selection of the firm of Goodkind Labaton Rudoff & Sucharow LLP as Lead Counsel.

3. Annexed hereto as Exhibit A is a true and correct copy of the certification and loss analysis of the Ohio State Funds.

4. Annexed hereto as Exhibit B is a true and correct copy of the October 15, 2004 notice of filing a class action against American International Group.

5. Annexed hereto as Exhibit C are copies of the firm resumes of Goodkind Labaton Rudoff & Sucharow LLP and Hahn Loeser & Parks LLP.

I declare, under penalty of perjury, this 14th day of December, 2004.


Shelley Thompson